

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 05-10016-RCL
 v.)
)
) VIOLATION:
)
)
 MICHAEL MCDONALD) Conspiracy to Possess
) Cocaine with the Intent
) to Distribute
) 18 U.S.C. §371

SUPERSEDING INFORMATION

COUNT ONE: Conspiracy to Possess Cocaine with the Intent
to Distribute - 18 U.S.C. §371

The United States Attorney charges that:

On or about November 24, 2004 at Quincy, in the District of
Massachusetts,

MICHAEL MCDONALD,

defendant herein, did willfully and knowingly, combine, conspire,
confederate, and agree with another to commit an offense against
the United States, namely, to knowingly and intentionally possess
with intent to distribute, cocaine, a Schedule II controlled
substance, in violation of Title 21, United States Code, Section
841 (a)(1).

In furtherance of the conspiracy and agreement, Michael
McDonald committed various overt acts in the District of
Massachusetts, including, among others, the following:

1. On or about November 24, 2004, the defendant drove an
individual named Nuerel Carr to the Best Western Hotel in Quincy,
Massachusetts, so that Nuerel Carr could obtain cocaine from an

individual named Donovan Sorrell.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION (21 U.S.C. §853)

The United States Attorney further charges that:

1. As a result of the offenses alleged in Count 1 of this Superseding Information,

MICHAEL MCDONALD,

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section
853.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Donald L. Cabell
DONALD L. CABELL
JEREMY STERNBERG
Assistant U.S. Attorneys

February 16, 2007

JS 45 (5/97) - (Revised USAO MA 3/25/02)

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**

Place of Offense:

Category No. IIInvestigating Agency ICECity Boston

Related Case Information:

County SuffolkSuperseding Ind./ Inf. XXXXXXCase No. 05-10016-RCLSame Defendant XXXXXX

New Defendant

Magistrate Judge Case Number

MJ 04-M-282-JLA

Search Warrant Case Number

R 20/R 40 from District of

Defendant Information:Defendant Name Michael McDonald

Juvenile

☐ Yes☒ No

Alias Name

Address 16 Constitution Way, MattapanBirth date: 1963SS#: 4952Sex: MRace: Black

Nationality:

Defense Counsel if known: John M. MoscardelliAddress: 8 Winter St., Boston, MA 02108

Bar Number:

U.S. Attorney Information:AUSA Donald L. Cabell

Bar Number if applicable

Interpreter:

☐ Yes☒ No

List language and/or dialect:

Matter to be SEALED:

☐ Yes☒ No☐ Warrant Requested☐ Regular Process☒ In Custody**Location Status:**Arrest Date: November 24, 2004☒ Already in Federal Custody as of November 24, 2004 in P.C.C.F.☐ Already in State Custody ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by on

Charging Document:

☐ Complaint☒ Information☐ Indictment

Total # of Counts:

☐ Petty☐ Misdemeanor☒ Felony 2

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☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: February 14, 2007

Signature of AUSA:



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District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Michael McDonald

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspir. To Poss. Cocaine W/Intent to Dist.</u>	<u>1</u>
Set 2	<u>21 U.S.C §853</u>	<u>Forfeiture Allegation</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: ICE